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LUBIN & ENOCH, P.C. 1 RECEIVED Nicholas J. Enoch, State Bar No. 016473 AZ CORP COMMISSION Kaitlyn A. Redfield-Ortiz, State Bar No. 030318 2 DOCKET CONTROL Emily A. Tornabene, State Bar No. 030855 2017 FEB -7 P 3 39 349 North Fourth Avenue 3 Arizona Corporation Commission Phoenix, Arizona 85003 DOCKETED Telephone: 602-234-0008 4 Facsimile: 602-626-3586 7 201 5 Email: nick@lubinandenoch.com DOCKETED BY Attorneys for Intervenor IBEW Locals 387 and 769 6 7 BEFORE THE ARIZONA CORPORATION COMMISSION 8 TOM FORESE, Chairman BOB BURNS, Commissioner BOYD DUNN, Commissioner 9 DOUG LITTLE, Commissioner ANDY TOBIN, Commissioner 10 E.01345D-160123 11 IN THE MATTER OF THE APPLICATION Docket No.: E-01345A-16-0036 OF ARIZONA PUBLIC SERVICE 12 LOCAL UNIONS 387 AND 769 OF THE COMPANY FOR A HEARING TO INTERNATIONAL BROTHERHOOD OF DETERMINE THE FAIR VALUE OF THE 13 ELECTRICAL WORKERS' MOTION UTILITY PROPERTY OF THE COMPANY FOR EXTENSION OF TIME FOR RATEMAKING PURPOSES, TO FIX A 14 JUST AND REASONABLE RATE OF RETURN THEREON, TO APPROVE RATE 15 SCHEDULES DESIGNED TO DEVELOP SUCH RETURN. 16 17 Local Unions 387 and 769 of the International Brotherhood of Electrical Workers ("IBEW Locals") respectfully request that the Administrative Law Judge ("ALJ") grant an 18 extension of time and accept the direct testimony of G. David Vandever ("Mr. Vandever") filed 19 on February 6, 2017. According to Ariz. Admin. Code R14-3-209, "[f]or good cause shown, 20 continuances and extensions of time will be granted in the discretion of the Presiding Officer[.]" Direct testimony in this matter was to be filed by February 3, 2017. On that day, several 21 revisions were made to Mr. Vandever's testimony. After making multiple attempts to reach both 22 IBEW Locals for authorization of the revisions, it became evident that the testimony would not 23 be timely filed. As a result, the undersigned promptly sent an email to all parties indicating that 24

Mr. Vandever's testimony would be filed early the week of February 6, 2017, and also provided a brief summary of the contents of the testimony. To date, there are no objections in response to the email. Therefore, the IBEW Locals respectfully request that the ALJ grant an extension of time and accept Mr. Vandever's testimony.

RESPECTFULLY SUBMITTED this 7th day of February, 2017.

Mcholas J. Enoch Esq. Lubin & Enoch, P.C.

CERTIFICATE OF SERVICE Original and thirteen copies of the Local Unions 387 and 769 of the International Brotherhood of Electrical Workers' Motion for Extension of Time filed this 7th day of February, 2017, with: Arizona Corporation Commission **Docket Control Center** 1200 West Washington Street Phoenix, Arizona 85007-2996 Copies of the foregoing transmitted electronically or mailed this same date to those identified on the attached service list for this docket. F:\Law Offices\client directory\IBEW L 387\APS\123\2017-2-7 (1445-123) Motion for Extension of Time.docx

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